

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

vs.

HAMID AKHAVAN and RUBEN WEIGAND

Criminal Action No. 1:20-cr-00188

AFFIDAVIT OF JEREMY ALLAIRE

I, Jeremy Allaire, do hereby declare and state under penalty of perjury:

1. I am the Chief Executive Officer (“CEO”) for Circle Internet Financial, LLC (“Circle”). I have been in this position since 2013. The following statements are based on my personal knowledge.

2. Circle is not a party to and has not been involved in the criminal matter captioned *United States v. Akhavan*, et al., No. 1:20-cr-00188, pending in the United States District Court for the Southern District of New York.

3. Circle is an enterprise technology company that offers clients a payments and treasury infrastructure whereby online companies can take card and bank transfer payments for goods or services and receive settlement in USD Coin (“USDC”), a regulated and fully reserved digital dollar stablecoin pegged to the U.S. dollar 1:1.

4. A stablecoin is a type of cryptocurrency whose value is tied to an outside asset, such as the U.S. dollar or gold, to stabilize the price. Stablecoins try to tackle price fluctuations by tying the value of the cryptocurrencies to other more stable assets.

5. Through its products, Circle helps businesses and developers harness the power of USDC for payments and internet commerce worldwide.

6. Eaze Technologies, Inc (“Eaze”) owns and operates an online platform that provides delivery of marijuana products in the state of California and is currently a client of Circle.

7. Circle first began facilitating payments between Eaze’s customers and Eaze in July 2020. Eaze and Circle did not have a business relationship before that time.

8. Circle has never conducted business with Ruben Weigand, or his co-defendant Hamid Akhavan, in any capacity.

9. I understand that Circle has been served with a criminal subpoena for documents by Ruben Weigand, who is a criminal defendant in the case referenced above.

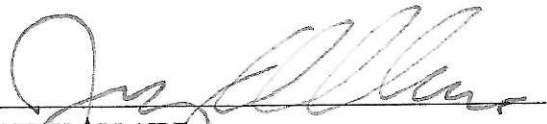
10. To the extent documents responsive to the subpoena exist, they would contain highly confidential and commercially sensitive business information related to Circle’s technology and payment processes, which Circle does not disclose to the public.

11. Specifically, the requests seek communications with Eaze and any other marijuana dispensaries that would reveal sensitive client information, confidential financial transactions, and how Circle conducts its innovative business including, but not limited to, the process in which it conducts payment transactions using stablecoins.

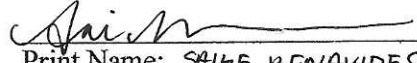
12. The process in which Circle conducts payment transactions using stablecoins is at the center of Circle’s business model and Circle has expended significant time and energy to develop it.

13. Requiring Circle to turn over such information would place Circle at a competitive disadvantage.

I declare under penalty of perjury that the foregoing is true and correct. Executed on this
5th day of February 2021 in Boston, Massachusetts.


JEREMY ALLAIRE
CEO OF CIRCLE INTERNET FINANCIAL LLC

SUBSCRIBED AND SWORN TO before me this 5th day of February 2021.


Print Name: SAIGE BENAVIDES
NOTARY PUBLIC in and for the
Commonwealth of Massachusetts,
Residing at BOSTON, MA
My appointment expires: Feb 3, 2023

